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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
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MOTORS LIQUIDATION COMPANY, <i>et al.</i>,	:
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	:
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**DECLARATION OF CARRIANNE BASLER IN RESPONSE TO MOTION OF
SANG CHUL LEE AND DUKSON LEE FOR ORDER PURSUANT TO SECTION
362(d) OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 4001
AND LOCAL BANKRUPTCY RULE 4001-1 MODIFYING THE
AUTOMATIC STAY TO ALLOW CONTINUATION OF
PRE-PETITION LITIGATION [DOCKET NO. 3023]**

I, Carrienne Basler, hereby declare under penalty of perjury:

1. I am a managing director for AlixPartners, LLP and an authorized representative of AP Services, LLC ("APS"), which is currently acting as crisis manager to Motors Liquidation Company and its affiliated debtors and debtors in possession (collectively, the "**Debtors**"). As part of my work I have knowledge of the claims register maintained by the Debtors in these chapter 11 cases. I submit this declaration in further support of the Debtors' Objection dated July 29, 2009 [Docket No. 3485] to the

Motion of Sang Chul Lee and Dukson Lee for Order Pursuant to Section 362(d) of the Bankruptcy Code, Bankruptcy Rule 4001 and Local Bankruptcy Rule 4001-1 Modifying the Automatic Stay to Allow Continuation of Pre-Petition Litigation [Docket No. 3023].

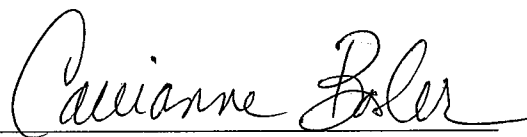
I have personal knowledge of the facts stated herein and I am competent to make this declaration.

2. Upon information and belief, exhibit A is a true and correct copy of the Affidavit of Service of Barbara Kelley Keane and the relevant portions of the service lists attached thereto. Exhibit A indicates that between September 24, 2009 and September 26, 2009 the Debtors' claims and noticing agent, The Garden City Group, Inc., served Sang Chul Lee, Dukson Lee, Jin Ah Lee, and the Kimm Law Firm each with a proof of claim form and the Notice of Bar Dates for Filing of Proofs of Claim indicating that the bar date for filing prepetition claims was November 30, 2009.

3. Upon information and belief, on February 22, 2010, The Garden City Group, Inc., received a proof of claim from Sang Chul Lee and Dukson Lee (the "Lees"). The Lees' proof of claim was filed nearly three months after the bar date and shortly after counsel for the Debtors informed counsel for the Lees that the claims register in these chapter 11 cases did not reflect any proofs of claim filed by or on behalf of the Lees, Jin Ah Lee, or the Kimm Law Firm.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: February 25, 2010

By: 
Carianne Basler
AP Services, LLC
Authorized Representative